

PSJ3

Exhibit 558

Suspicious Order Monitoring - FAQs

April 2008

For HSCS-P Sales and Operations

CARDINAL HEALTH CONFIDENTIAL

Sales

- 1. What resolution time should Sales consultants expect when a customer hits a threshold?**
Customers should expect no greater than a 48 hour resolution time from the time the completed questionnaire is received by QRA. Threshold issue resolution can be tracked online by managers and directors.
- 2. What specific data can Sales provide to help QRA?**
Usage data over the past twelve months for controlled substances is the most helpful data that can be provided to QRA. If twelve months of data is not available, please provide as much as possible. Additionally, any change to a customer's business should also be shared with QRA.
- 3. What reports will be available to Sales Consultants?**
A released order list is available as well as a sales percentage report of controlled products compared to non-controlled products. Threshold reports are not available to Sales or customers.
- 4. Who is the point of contact if a customer states "I want to talk to someone higher up."**
If a customer requires a conversation with Cardinal Health QRA, please have them contact Chris Forst at 614.757.8203 or Steve Morse at 614.757.4939.
- 5. I have had difficulty getting a response from QRA. What can we tell customers about an expected turnaround time?**
An overwhelming amount of thresholds were hit in the month of February, making it difficult for QRA to resolve issues in timely manner. The expected turnaround time is now within 48 hours from the time the completed questionnaire is received by QRA.
- 6. Is the new account questionnaire available online?**
Yes, the questionnaire is available at www.somsurvey.com.
- 7. What is the address of the website on which I can monitor the progress/status of QRA held orders?**
Sales managers, directors and vice presidents have access to a QRA website to track issue resolution. This website is available using the following URL: <http://www.mycardinalsomstatus.com>.

Customers

- 1. Who is responsible for contacting the customer if a threshold is hit?**
Sales consultants are responsible for contacting customers. Sales Operations sends out a daily threshold report to sales consultants to initiate contact with those customers who have hit a threshold and request that they complete a survey.
- 2. Who is responsible for contacting the customer if their order is reported to the DEA as suspicious?**
Sales consultants will be responsible for communicating with customers for any held order, whether or not any action is taken on the customer. Reporting a suspicious order does not always require taking action on the customer. If a decision that continued sales of controlled substances creates an unreasonable risk of diversion by the customer, sales consultants will be notified after the action has been taken. Sales consultants will contact the customer and advise that the customer will no longer be able to order controlled substances from Cardinal Health.
- 3. What should the customers expect when they hit a threshold (i.e. response time from QRA when a fax is sent in?)**
QRA will conduct an immediate review of an account prior to sending a questionnaire. QRA may release

the order that exceeds the thresholds if the order is not suspicious. Sales consultants will receive a daily report and are expected to contact customers who have hit a threshold and ask them to complete a questionnaire. Before a threshold can be adjusted, the questionnaire must be returned with meaningful information that would substantiate a change in the threshold.

4. What pictures do customers need to take of their stores?

Sales or QRA will take necessary pictures on site visits/new customer setups. Customers do not need to obtain cameras to take store pictures.

5. If a customer wants to increase its purchases from us and move away from other suppliers how do we increase their thresholds?

12 month total usage history [dispensing data directly from the software is best] is helpful in capturing all of a customer's purchases and will provide QRA necessary information to adjust thresholds accordingly.

6. In terms of order flow, can we alert the customer earlier in the order process that an order has been flagged?

A 75 percent threshold report is reviewed every week for customers who are approaching a threshold. Any account that has surpassed 85 percent of their threshold will have their purchases analyzed and if appropriate, proactively adjusted. **Customers are not informed as their purchases approach the monthly threshold.*

7. Why are new accounts hitting thresholds so quickly?

Without 12 month usage data, new accounts are categorized in the small bucket. Usage data is critical in setting up accounts properly.

8. How does a customer change its DEA number / add a new one?

Customers operating "combo shops" should contact the DEA and apply for a new number the same way they applied for their original DEA registration number. The customer should immediately provide this new number to their Sales Consultant for processing by Cardinal Health.

9. When will Long Term Care facilities (Class 42) be included in SOM?

There has been no date determined when these facilities will be included in our Suspicious Order Monitoring system.

QRA Specific

1. Is a QRA site visit communicated to the customer prior to the visit?

In most instances, the customer receives prior notice of a site visit. There may be circumstances where an unannounced visit will occur.

2. If a QRA Field Compliance Officer is present with the sales consultant at an initial store visit, will it in any way speed up the new customer on-boarding process?

Field Compliance Officers will not speed up an on-boarding process; however, partnering with a Field Compliance Officer will help with collecting the necessary information needed to set thresholds more accurately with regards to our SOM system.

3. The QRA Survey forms say "Retail Independent." Is this form required for Surgery Centers?

If a surgery center is coded as a retail independent (Class Code 10), please contact the DC for re-coding. Surgery centers and other classes of trade will have their own questionnaires developed when SOM is implemented for the applicable class of trade.

4. Is corporate QRA monitoring new product launches into the marketplace? These items can cause spikes in purchasing and could affect thresholds if they are not proactively adjusted.

Yes, QRA is monitoring the market for changes that could affect ordering trends, and QRA is currently conducting analysis to determine whether existing product launches can predict future product launches to minimize interruption of the legitimate supply chain.

5. Are there any guidelines that our QRA department can give to the customer's QRA department?

If a retail independent customer has a QRA department they are advised to contact Steve Reardon at 614.757.7101.

DC Specific

1. Can I stop an order if it looks suspicious and I notify my supervisor?

Our SOM system should capture all suspicious orders; however, if any employee notices an order of unusual size or frequency, initial contact with a cage supervisor, on-site QRA Compliance Officer and Corporate QRA are critical. The supervisor or the QRA Compliance Officer will review the customer's month-to-date purchases of the item as compared to the customer's monthly average and may authorize a shipment up to that average. *Anti-Diversion is everyone's responsibility.*

2. How will I know if an order is suspicious if I don't normally pick for that customer?

Excessive quantities should be monitored, regardless of who the customer is. If an unusual order quantity is being picked, that should be a red flag and you should immediately contact the cage supervisor, on-site QRA Compliance Officer and Corporate QRA. The supervisor or the QRA Compliance Officer will review the customer's month-to-date purchases of the item as compared to the customer's monthly average and may authorize a shipment up to that average.

General

1. When do we anticipate the "flood" of held orders will diminish?

Held orders diminished significantly in March – approximately 60 percent less than the month of February.

2. Will controlled substances be included in RBC orders this year?

No, controlled substances and List 1 Chemicals are not eligible for RBC incentives. The customer incentive programs have been appropriately adjusted to compensate for the removal of controlled substances.

3. Who is responsible for completing a DEA-106 (Theft/Loss) form when the issue is a result of an incorrect invoice from Cardinal Health?

Customers should first confirm if an invoice is incorrect. If Cardinal Health has shipped an order accurately but a line was held for QRA review, the invoice will identify that the line is being held. If an entire order is shipped accurately and product still appears to be missing, the customer, if the delivery was accepted and signed for, should explore the possibility of theft and then complete a DEA-106 form. In those cases where a customer identifies a shortage upon delivery and signs for the order as short, Cardinal Health would be responsible for completing the DEA-106 form if it was determined that product was lost or stolen

4. If a site visit is indicated on the SOM web-site, what do the letters "Q" and "S" represent?

The letter "Q" indicates that the site visit will be performed by QRA and the letter "S" indicates that the site visit will be performed by Sales. Sales site visits will occur in the future after the Anti-Diversion team has established and implemented the training curriculum.

5. Can our systems identify and automatically delete duplicate orders of the same item and dollar amount? While there is an understanding that we are trying to capture order "intent," it would seem that most if not all of these are errors.

No, our system does not have the logic to detect user errors. Not all orders that appear as duplicates actually are errors, and it is important to capture this intent.

Ordering Example:

1. If a customer is near its threshold for a drug family and places a two-line order for that family - the first line is a large quantity and the second line is a small quantity - will the smaller line be shipped if larger one puts the customer over the threshold?

No, as soon as the first line puts a customer above its threshold, every subsequent line will be held for that particular drug family. The SOM system will recognize lines in the order they were placed, therefore the second line will be held.